

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JOSE ANGEL HERNANDEZ ORTIZ
Debtor(s)

FIRSTBANK PUERTO RICO

Movant

JOSE ANGEL HERNANDEZ ORTIZ
and Chapter 13 Trustee,
ALEJANDRO OLIVERAS RIVERA

Respondent(s)

CASE NO. 10-11575 BKT

CHAPTER 13

MOTION REQUESTING ENTRY OF ORDER LIFTING AUTOMATIC STAY

TO THE HONORABLE COURT:

Comes now, FIRSTBANK PUERTO RICO, ("FIRSTBANK") secured creditor, represented by the undersigned attorney who respectfully pray and state as follows:

1. That on March 23, 2011, FIRSTBANK filed a Motion for Relief from Stay under 362 due to Debtor's post-petition arrears on the mortgage loan. (See docket entry number 36).
2. During the Preliminary Hearing held on April 19, 2011, the Court scheduled a Final Hearing for May 26, 2011.
3. During the Final Hearing the Court ordered to Debtor cure the arrears within thirty (30) days or the stay will be lifted automatically.
4. As to this date, the total amount of post petition arrears owed to FIRSTBANK is \$1,285.41 (See Exhibit A).

5. That for the reason stated above, FIRSTBANK respectfully requests that an order be entered lifting the automatic stay in favor of FIRSTBANK.

WHEREFORE, FIRSTBANK respectfully requests from this Honorable Court that an order be entered lifting the automatic stay pursuant 11 USC section 362.

RESPECTFULLY SUBMITTED.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

Pursuant to the provisions of Rule 4001(d) and 2002 (a)(3) of the Federal Rules of Bankruptcy Procedure and LBR 9013 (h), you are hereby notified that you have a term of FOURTEEN (14) days from this notice hereof to file any objection to the approval of this motion. In the event that no timely objection is filed the Court may grant the relief requested without the need of any further hearing.

In San Juan, Puerto Rico, on 11th day of June, 2011.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on this date copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will sent notification of such filing to debtor(s) attorney José M. Prieto Carballo. and to ALEJANDRO OLIVERAS RIVERA, US Chapter 13 Trustee, and also certify that I have mailed by United States Postal Service copy of the document to the non CM/ECF participants.

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s/José F. Cardona Jiménez, USDC PR 124504
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Todo está en uno

6/27/2011

JOSE HERNANDEZ-ORTIZ
PMB 105497
AVE EMILIANO PAL
SAN JUAN PR 00926

RE: HIPOTECA #224887
BK: 10-11575

1	Meses a base	\$ 806.53	\$ 806.53
0	Meses a base		\$ -
	Recargos Acumulados		78.88
	Otros Cargos		-
	Inspecciones		-
	Gastos de Ejecucion		-
	Gastos de Quiebra		400.00
	Reserva Negativa		-
	Suspense		-
	Total due		\$ 1,285.41

Deben de reinstalar con cheque certificado o giro postal , no se aceptaran cheques persona
Estos números son validos hasta 6-30-11

Cordialmente

Juan A Benitez
Departamento de Hipoteca
Tel. (787) 283-4100 Ext 2455